

Exhibit H

Matthew Wood

From: Matthew Wood
Sent: Thursday, March 6, 2025 5:07 PM
To: 'Nick Williamson'; james.lomeo; '#GeniusSports-SportsCastr'; PANDA-SportRadar_23-cv-00472; 'SportsCastr'
Cc: 'BCLP_Sportradar_23-cv-00472'; Michael Smith
Subject: RE: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]
Attachments: 2025-03-06 PANDA v. Sportradar et al Second Amended Docket Control Order (PANDA Proposal).docx

Counsel,

Thank you for your time on Tuesday. Having considered Sportradar's proposal and the explanations provided during the meet and confer, PANDA does not agree that an extension of the case schedule is necessary.

Sportradar's stated explanation was that typical antitrust cases take 18 months. By the time this case reaches trial, even under the current schedule, more than 24 months will have passed. Many of the fundamental issues, documents, contracts, data, and witnesses relevant to PANDA's new antitrust claims—in particular PANDA's lost business due to unlawful competition from Defendants—has been at the center of PANDA's patent claims for well over a year. Moreover, there is still over a half a year left in discovery for the parties to address the few new issues raised by the antitrust claims. No extension of the schedule is warranted.

Nonetheless, in an effort to resolve this issue without burdening the Court, PANDA is willing to agree to a 4-week extension of the trial date to accommodate additional discovery as set forth in the attached proposed amended DCO.

However, PANDA is not willing to agree to extend the claim construction deadlines. Sportradar has offered no explanation for how PANDA's antitrust allegations necessitate an extension on claim construction. They do not.

Moreover, PANDA does not agree that a deadline to propose amendments to the discovery and protective orders is appropriate. Sportradar did not articulate any new issues that it believes merit such an amendment. If Sportradar (or any other party) discovers such an issue, nothing stops that party from seeking an amendment at that time. However, PANDA will not agree to any delay in discovery while Sportradar mulls over non-existent issues.

Finally, PANDA proposes that a portion of this extension should be used to expand the time available for expert discovery. The patent claims benefit from detailed infringement and invalidity contentions, which enable opposing experts to anticipate each other's opinions and address them in a single report. The likelihood of raising new issues for the first time in a rebuttal report is substantially higher with respect to the antitrust claims. Therefore, PANDA proposes that the parties agree to allow experts to submit a reply report addressing any new issues raised in a rebuttal to their opening report on any antitrust issues.

Regards,

Matthew Wood
Senior Associate

T: +1 512 457 2033 | E: MWood@KSLAW.com | [Bio](#) | [vCard](#)

King & Spalding LLP

500 W 2nd Street
Suite 1800
Austin, TX 78701



kslaw.com

From: Matthew Wood

Sent: Thursday, March 6, 2025 12:34 PM

To: Nick Williamson <nick.williamson@bclplaw.com>; james.lomeo <james.lomeo@kirkland.com>; #GeniusSports-SportsCastr <GeniusSports-SportsCastr@kirkland.com>; PANDA-SportRadar_23-cv-00472 <PANDA-SportRadar_23-cv-00472@KSLAW.com>; SportsCastr <sportscastr@cjsjlaw.com>

Cc: BCLP_Sportradar_23-cv-00472 <BCLP_Sportradar_23-cv-00472@bclplaw.com>; Michael Smith <michael.smith@solidcounsel.com>

Subject: RE: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]

Nick,

We are still working on considering Sportradar's proposal which was only provided a couple days ago. Moreover, PANDA was not given any advance notice of when to expect Sportradar's proposal. While we are working diligently to address the request, several members of our team have been traveling this week to attend to prior commitments, which has slowed our review.

Sportradar's proposal touches every single aspect of the case and complicates previously negotiated issues such as e-discovery and claim narrowing. Considering all the implications of your proposal requires considerable time. As I stated on the call, while I was hopeful that we would be able to provide a response by Wednesday, I could not guarantee it. I will update you on the status of our review this afternoon.

Regards,

Matthew Wood
Senior Associate

T: +1 512 457 2033 | E: MWood@KSLAW.com | [Bio](#) | [vCard](#)

King & Spalding LLP
500 W 2nd Street
Suite 1800
Austin, TX 78701



kslaw.com

From: Nick Williamson <nick.williamson@bclplaw.com>

Sent: Thursday, March 6, 2025 9:55 AM

To: Matthew Wood <MWood@KSLAW.com>; james.lomeo <james.lomeo@kirkland.com>; #GeniusSports-SportsCastr <GeniusSports-SportsCastr@kirkland.com>; PANDA-SportRadar_23-cv-00472 <PANDA-SportRadar_23-cv-00472@KSLAW.com>; SportsCastr <sportscastr@cjsilaw.com>

Cc: BCLP_Sportradar_23-cv-00472 <BCLP_Sportradar_23-cv-00472@bclplaw.com>; Michael Smith <michael.smith@solidcounsel.com>

Subject: RE: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]

CAUTION: MAIL FROM OUTSIDE THE FIRM

Matt,

PANDA has had the Sportradar Defendants' proposed Second Amended Docket Control Order since last Friday, we met and conferred on Tuesday, based upon that meet and confer we expected to receive PANDA's position by COB yesterday, and PANDA has failed to provide its position. Please do so immediately. Thank you.

Best,

Nick



Nick Williamson
Partner
Bryan Cave Leighton Paisner LLP - St. Louis, MO USA
nick.williamson@bclplaw.com
T: +1 314 259 2661 M: +1 314 497 7305

From: Matthew Wood <MWood@KSLAW.com>

Sent: Tuesday, March 4, 2025 11:18 AM

To: Nick Williamson <nick.williamson@bclplaw.com>; james.lomeo <james.lomeo@kirkland.com>; #GeniusSports-SportsCastr <GeniusSports-SportsCastr@kirkland.com>; PANDA-SportRadar_23-cv-00472 <PANDA-SportRadar_23-cv-00472@KSLAW.com>; SportsCastr <sportscastr@cjsilaw.com>

Cc: BCLP_Sportradar_23-cv-00472 <BCLP_Sportradar_23-cv-00472@bclplaw.com>; Michael Smith <michael.smith@solidcounsel.com>

Subject: RE: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]

Nick,

Simply stating that PANDA is "incorrect" does not make it so. The fact is that PANDA filed its Second Amended Complaint—which Sportradar contends necessitates its proposed extension—on February 14. Sportradar did not provide its proposal until February 28—two weeks later.

Meanwhile, PANDA has had just two business days to consider Sportradar's myriad proposals. PANDA had no reason to believe Sportradar would propose entirely new deadlines never before discussed by the parties. PANDA also had no reason to believe Sportradar would propose extensions to purely patent-related deadlines (such as claim construction) in response to the addition of non-patent claims.

PANDA is available to meet and confer at 2:00 p.m. in an effort to better understand Sportradar's proposal and the purported justifications. However, PANDA will not be pressured into taking a position before it has had time to fully consider Sportradar's proposal.

Regards,

Matthew Wood
Senior Associate

T: +1 512 457 2033 | E: MWood@KSLAW.com | [Bio](#) | [vCard](#)

King & Spalding LLP
500 W 2nd Street
Suite 1800
Austin, TX 78701



kslaw.com

From: Nick Williamson <nick.williamson@bclplaw.com>

Sent: Monday, March 3, 2025 2:19 PM

To: james.lomeo <james.lomeo@kirkland.com>; Matthew Wood <MWood@KSLAW.com>; #GeniusSports-SportsCastr <GeniusSports-SportsCastr@kirkland.com>; PANDA-SportRadar_23-cv-00472 <PANDA-SportRadar_23-cv-00472@KSLAW.com>; SportsCastr <sportscastr@cjsjlaw.com>

Cc: BCLP_Sportradar_23-cv-00472 <BCLP_Sportradar_23-cv-00472@bclplaw.com>; Michael Smith <michael.smith@solidcounsel.com>

Subject: RE: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]

CAUTION: MAIL FROM OUTSIDE THE FIRM

Jim and Matt,

Thank you for your replies. We are also available on March 4 at 2pm CT and will send a calendar invitation for that day/time, as we agree that the Parties need to work expeditiously on this – which is why the Sportradar Defendants accelerated their preparation of the proposed Second Amended Docket Control Order and invited a prompt meet and confer. Counsel for PANDA, if you will not participate in that meet and confer please let us know today.

Further, PANDA is incorrect to contend that the Sportradar Defendants took two weeks to prepare their proposal. PANDA filed its Second Amended Complaint late in the day on the final deadline for it to do so, and the Sportradar Defendants are entitled to necessary and appropriate time to, *inter alia*, review that amended pleading and its new allegations and claims and identify and retain counsel regarding those new allegations and claims. While the Sportradar Defendants timely prepared and provided all Parties with their proposal, in contrast, PANDA has undoubtedly known of its new claims and allegations for some time and can expeditiously review and respond to the Sportradar Defendants' proposal (the Genius Defendants have done so). And, as you've acknowledged, PANDA has known that the proposal was forthcoming and we maintain the accuracy of our statement concerning the prior meet and confer.

Best,
Nick



Nick Williamson
Partner
Bryan Cave Leighton Paisner LLP - St. Louis, MO USA
nick.williamson@bclplaw.com
T: +1 314 259 2661 M: +1 314 497 7305

From: Lomeo, James John <james.lomeo@kirkland.com>

Sent: Monday, March 3, 2025 1:49 PM

To: Matthew Wood <MWood@KSLAW.com>; Nick Williamson <nick.williamson@bclplaw.com>; #GeniusSports-SportsCastr <GeniusSports-SportsCastr@kirkland.com>; PANDA-SportRadar_23-cv-00472 <PANDA-SportRadar_23-cv-00472@KSLAW.com>; SportsCastr <sportscastr@cjsjlaw.com>

Cc: BCLP_Sportradar_23-cv-00472 <BCLP_Sportradar_23-cv-00472@bclplaw.com>; Michael Smith <michael.smith@solidcounsel.com>

Subject: RE: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]

Counsel,

The Genius Sports Defendants have reviewed Sportradar's proposal, and we are not taking a position on a schedule extension at this time. We, however, are interested in PANDA's position and any counter-proposal it might have and discussing the proposals on a meet-and-confer. As the parties are aware, there are a number of significant deadlines that are quickly approaching. Thus, the parties need to work expeditiously to submit a proposal to the Court this week. We are available to meet and confer on March 4 at 2pm CT.

Thanks,
Jim

James John Lomeo

KIRKLAND & ELLIS LLP
401 Congress Avenue, Austin, TX 78701
T +1 512 355 4316
F +1 512 678 9101

james.lomeo@kirkland.com

From: Matthew Wood <MWood@KSLAW.com>

Sent: Monday, March 3, 2025 12:58 PM

To: nick.williamson <nick.williamson@bclplaw.com>; #GeniusSports-SportsCastr <GeniusSports-SportsCastr@kirkland.com>; PANDA-SportRadar_23-cv-00472 <PANDA-SportRadar_23-cv-00472@KSLAW.com>; SportsCastr <sportscastr@cjsjlaw.com>

Cc: BCLP_Sportradar_23-cv-00472 <BCLP_Sportradar_23-cv-00472@bclplaw.com>; Michael Smith <michael.smith@solidcounsel.com>

Subject: RE: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]

Nick,

PANDA never suggested that an extension of the case schedule was necessary during our meet and confer. PANDA simply noted that Sportradar's promised, but not yet provided, proposed motion to extend the case schedule complicated the scheduling of other case deadlines.

Sportradar took two weeks to prepare its proposal, which impacts every forthcoming deadline in the case and adds brand new deadlines (such as a deadline for third-party discovery) that the parties have never discussed.

Expecting PANDA and Genius to be prepared to address your proposal within one business day is unreasonable. We are discussing your proposal with our client and will provide a response within a reasonable timeframe. We note that Genius has not yet provided its position on Sportradar's proposal either.

Regards,

Matthew Wood
Senior Associate

T: +1 512 457 2033 | E: MWood@KSLAW.com | [Bio](#) | [vCard](#)

King & Spalding LLP
500 W 2nd Street
Suite 1800
Austin, TX 78701



kslaw.com

From: Nick Williamson <nick.williamson@bclplaw.com>
Sent: Monday, March 3, 2025 10:09 AM
To: #GeniusSports-SportsCastr <GeniusSports-SportsCastr@kirkland.com>; PANDA-SportRadar_23-cv-00472 <PANDA-SportRadar_23-cv-00472@KSLAW.com>; SportsCastr <sportscastr@cjsjlaw.com>
Cc: BCLP_Sportradar_23-cv-00472 <BCLP_Sportradar_23-cv-00472@bclplaw.com>; Michael Smith <michael.smith@solidcounsel.com>
Subject: RE: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]

CAUTION: MAIL FROM OUTSIDE THE FIRM

Counsel,

Could you please let us know your position on the proposed Second Amended Docket Control Order and, if needed, availability to meet and confer today? Thank you.

Best,
Nick



Nick Williamson
Partner
Bryan Cave Leighton Paisner LLP - St. Louis, MO USA
nick.williamson@bclplaw.com
T: +1 314 259 2661 M: +1 314 497 7305

From: Nick Williamson <nick.williamson@bclplaw.com>
Sent: Friday, February 28, 2025 12:47 PM

To: #GeniusSports-SportsCastr <GeniusSports-SportsCastr@kirkland.com>; PANDA-SportRadar_23-cv-00472 <PANDA-SportRadar_23-cv-00472@KSLAW.com>; SportsCastr <sportscastr@cjsjlaw.com>
Cc: BCLP_Sportradar_23-cv-00472 <BCLP_Sportradar_23-cv-00472@bclplaw.com>; Michael Smith - Siebman, Burg, Phillips & Smith LLP (Michael.Smith@solidcounsel.com) <Michael.Smith@solidcounsel.com>
Subject: PANDA v. Sportradar Group AG, et al. [_BCLP-USA.3010193.000004.FID9132754]

Counsel for PANDA and Counsel for Genius,

As you know, the Sportradar Defendants have been diligently working to prepare a proposed Second Amended Docket Control Order extending case deadlines in view of the new allegations in PANDA's Second Amended Complaint. We understand from the discussions during our Tuesday meet and confer that PANDA recognizes that extensions are necessary, as well. Attached please find the Sportradar Defendants' proposal.

Do each of PANDA and Genius agree with this proposal? If not, we ask that you provide your availability for a meet and confer later today, over the weekend, or at the latest on Monday morning. We look forward to your responses. Thank you.

Best,
Nick



Nick Williamson
Partner
nick.williamson@bclplaw.com
T: +1 314 259 2661 M: +1 314 497 7305

Bryan Cave Leighton Paisner LLP
One Metropolitan Square, 211 North Broadway, Suite 3600, St. Louis, MO 63102

bclplaw.com



This electronic message is from a law firm. It may contain confidential or privileged information. If you received this transmission in error, please reply to the sender to advise of the error and delete this transmission and any attachments.

We may monitor and record electronic communications in accordance with applicable laws and regulations. Where appropriate we may also share certain information you give us with our other offices (including in other countries) and select third parties. For further information (including details of your privacy rights and how to exercise them), see our updated Privacy Notice at www.bclplaw.com.

King & Spalding Confidentiality Notice:

This message is being sent by or on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message or attachments and we ask that you please comply with any additional instructions from the sender regarding deletion of messages or attachments sent in error. [Click here to view our Privacy Notice.](#)

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of the multi-national law firm Kirkland & Ellis LLP and/or its affiliated entities. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return email or by email to postmaster@kirkland.com, and destroy this communication and all copies thereof, including all attachments.

This electronic message is from a law firm. It may contain confidential or privileged information. If you received this transmission in error, please reply to the sender to advise of the error and delete this transmission and any attachments.

We may monitor and record electronic communications in accordance with applicable laws and regulations. Where appropriate we may also share certain information you give us with our other offices (including in other countries) and select third parties. For further information (including details of your privacy rights and how to exercise them), see our updated Privacy Notice at www.bclplaw.com.

This electronic message is from a law firm. It may contain confidential or privileged information. If you received this transmission in error, please reply to the sender to advise of the error and delete this transmission and any attachments.

We may monitor and record electronic communications in accordance with applicable laws and regulations. Where appropriate we may also share certain information you give us with our other offices (including in other countries) and select third parties. For further information (including details of your privacy rights and how to exercise them), see our updated Privacy Notice at www.bclplaw.com.